Site: Break: 3.8 Other: 1/18/87

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# **CHEMICALS GROUP**

**INVESTIGATION REPORT** 

OLIN CORPORATION McINTOSH, ALABAMA OLIN BASIN

Environmental Affairs Department Charleston, Tennessee

# **INVESTIGATION REPORT**

# OLIN CORPORATION McINTOSH, ALABAMA OLIN BASIN

# **APPROVALS:**

Project Manager:

A. L. Feldman

Quality Assurance Officer:

J. C. Brown

Manager, S.E. Regional
Environmental Affairs:

D. R. Vaughn

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- Field Overview Checklist
   Olin Chain-of-Custody Records
   Analytical Analysis including QA/QC data

#### SECTION I

#### INTRODUCTION

The purpose of this study was an investigation of potential releases of hazardous constituents to the Olin Basin in satisfaction of the requirements of 40 CFR 264.101 of RCRA and to provide Remedial Investigation information for CERCLA in response to the Forward Study Report, June 6, 1986 (Document Control #268-WPI-RT-CUZY-1, page 4-2 and 4-3), Attachment 1.

The sampling of the Olin Basin was conducted according to the Study Plan and Investigation dated October 1987 (Appendix 1) as amended and approved by a letter from Mr. James H. Scarbrough (USEPA) to Mr. Arnold Feldman (Olin) on November 10, 1987, Attachment 2, and modified to meet certain requirements of USEPA as specified in a letter from Mr. John A. Trudell, III, SPM (USEPA) to Mr. Arnold Feldman (Olin) received on November 30, 1987, Attachment 3.

This document presents the results of the sampling and analytical programs described in the Study Plan and Investigation of the Basin at the Olin McIntosh Alabama facility. The level of quality assurance, i.e., the number of blanks, spikes and replicates met or exceeded the requirements of the EPA's Contract Laboratory Program.

#### SECTION II

#### SUMMARY OF RESULTS

The sampling of the Olin Basin took place on December 8 and 9, 1987. The analytical data was received from BCM Laboratories on March 31, 1988. Analysis of the data indicates the following:

- (1) No 1,2-Dichlorobenzene, 1,4-Dichlorobenzene, pentachloronitrobenzene or hexachlorobenzene were detected in the Basin water.
- (2) Mercury detected in Basin water was at or below the Primary Drinking Water Level (2.0 ug/l).
- (3) There were minor levels of mercury in the sediments.
- (4) The concentration of mercury in extracts from the sediments per the EP test were near or below the limit of detection (0.2  $\mu$ g/l), and all were below the Primary Drinking Water Level.
- (5) Concentrations of dichlorobenzenes in the sediments were near or below the limit of detection.
- (6) Pentachloronitrobenzene (PCNB) was at or below the MEG (Multimedia Environmental Goals for Enironmental Assessment, EPA-600/7-77-136a, November 1777, and EPA-600/7-8-041, March 1980, USEPA, Industrial Environmental Research Laboratory, Research Triangle Park, NC.) for soil divided by a safety factor of 10.
- (7) Hexachlorobenzene was below the MEG for soil divided by 10 for all but one sample. Reanalysis of the sample showed hexachlorobenzene below the MEG divided by a safety factor of 10.

In conclusion, results of the sampling and analysis of the Olin Basin indicate that there is little or no contamination. This indicates that no further action is warranted.

#### SECTION III

#### SAMPLING PROGRAM/FIELD INVESTIGATION

Sampling of the sediments and surface water was conducted on December 8 and 9, 1987 under the observation of Mr. John Trudell (USEPA) and Mr. Charles Till (USEPA). Members of the Olin sampling team included: Mr. K. D. Roberts (Sampling Coordinator), Mrs. T. B. Odom (Field Project Officer), Mr. R. J. Cheek and Mr. S. E. Anderson. A copy of the Field Sampling Notes and Field Overview Checklist are attached as Appendices 2 and 3, respectively. There were no major problems encountered during the sampling. Two minor changes were made in the sampling procedures. The weighted bottle sampler could not be used without disturbing the sediment where water depths were less than 2 feet. In those cases, water samples were collected by hand at 50% depth. In cases of less than 1.0 feet of water sediment samples were collected using pre-cleaned stainless steel spoons. These changes were approved in the field by the EPA observers.

Duplicate water and sediment samples were collected from each sampling location. In addition, replicates for EPA were collected from one water sampling location and one sediment sampling location. Field blanks were prepared each day of sampling. A sample of the rinse water from the ponar dredge cleaning was also collected. Upon collection, each sample was assigned a random number (see Tables 1 through 3) and labelled. Immediately after labeling, each sample was stored on ice. Prior to shipping, sample seals were placed on each bottle and the shipping container. Chain-of-Custody was prepared and accompanied each sample container. Copies of the completed Chain-of-Custody are attached in Appendix 4.

EPA provided Olin with eight samples for analysis. These samples serve as a further quality assurance check on the laboratory. EPA QA samples were re-labeled with a random number and shipped to BCM Laboratory under Olin Chain-of-Custody. Table 4 lists the sample numbers assigned to the EPA QA samples.

The samples were shipped by Emory Air Freight with next day delivery to Olin's contract laboratory BCM, i.e. Plymouth Meeting, Pennsylvania. All water and sediment samples were sent to BCM in duplicate in case of loss of a sample due to breakage. After samples arrived at BCM, one sample from each sampling location was designated for analysis. Four blind duplicate water samples (two for mercury and two for organics) and two blind duplicate sediment samples were designated for analysis for intra-laboratory quality assurance as required by the Plan. The sampling locations were not revealed to the laboratory. Four additional water samples (two for mercury and two for organics) were designated as laboratory spike samples. The corresponding replicate sample was revealed to the laboratory so that they could calculate spike recoveries. As before, sample locations were not revealed. All EPA samples were designated for analysis.

#### SECTION IV

#### ANALYTICAL RESULTS AND ANALYSIS

#### GENERAL

Final analytical results were received from BCM Laboratories on March 31, 1988. A complete summary of the analytical results is given in the attached tables:

Table No.	Analysis				
٧	Mercury - Water				
VI	Organics - Water				
VII	Mercury - Sediment				
VIII	Dichlorobenzenes - Sediment				
IX	Hexachlorobenzene and Pentachloronitrobenzene - Sediment				
X	EPA Supplied Samples				

#### MERCURY - WATER (TABLE V)

All mercury in water samples were at or below the Primary Drinking Water Standard of 2.0  $\mu$ g/l. The replicate analyses were within acceptable tolerance of each other.

#### ORGANICS - WATER (TABLE VI)

All organics in water samples were below a detectable level of 10  $\mu$ g/l for the constituents analyzed, i.e., 1,2-Dichlorobenzene, 1,4-Dichlorobenzene,

hexachlorobenzene, and pentachloronitrobenzene. The replicate analytical results were all identical to the primary sample, i.e., below detectable levels. One sample (Olin #574, BCM #30385) experienced low surrogate recovery, but was accepted based on other QA/AC data and the consistency of the rest of the data set.

#### MERCURY - SEDIMENT (TABLE VII)

The total mercury in sediment varied from a low of 0.4 mg/kg to a high of 60.5 mg/kg. Extractable mercury (EP leachate test) concentration in extracts from the sediment was below a detectable level of 0.2 µg/l on all samples but one, which was 0.4 µg/l. While several duplicate sediment samples were analyzed after the 30 day holding time had expired; this should not affect the analysis for mercury which is non-volatile when kept refrigerated. After the 30 day holding time had expired, Olin received preliminary verbal results. Based upon these results, Olin decided to run additional analysis to confirm the insignificant contamination levels. These duplicate analyses were not part of the original analytical plan.

The sample which showed the most significant variation from its replicate was the sample with the highest concentration (60.5 mg/kg) with the replicate of 9.0 mg/kg. All samples indicated a relatively high standard deviation between replicates. Although the samples were thoroughly mixed in the field, this is probably due to the non-homogeneous nature of sediment samples.

# DICHLOROBENZENES - SEDIMENT (TABLE VIII)

All the sediments analyzed for dichlorobenzenes (1,2 and 1,4 isomers) were at or below 0.66 mg/kg; which in all but two (2) samples (Location A and I) was the detectable level. One replicate for location A showed detectable levels of each isomer, but at 0.35 and 0.33 mg/kg. The replicate for location A was analyzed on a

different day when the DL was 0.66 mg/kg. The sample for location "I" was re-extracted and analyzed along with the replicate sample after the 30 day holding time had expired based upon preliminary verbal results received after the 30 day holding time had expired. Neither sample contained dichlorobenzene above the detectable level. One sediment matrix spike (Olin #577; BCM #30495) resulted in low recovery, perhaps caused by matric interferences. Other spikes had good recoveries. The data are considered acceptable.

#### HEXACHLOROBENZENE AND PENTACHLORONITROBENZENE (TABLE IX)

Results for pentachloronitrobenzene in the sediment varied from a low of below detectable level (13 of the 21 samples) of 0.66 mg/kg to a high of 14.5 mg/kg. The MEG (Multimedia Environmental Goals for Environmental Assessment, EPA-600/7-77-136a, November 1977, and EPA-600/7-8-041, March 1980, USEPA, Industrial Environmental Research Laboratory, Research Triangle Park, NC) for pentachloronitrobenzene in soil is 1,000 mg/kg. The highest value obtained divided by a safety factor of 10 was still lower than the MEG.

Results for hexachlorobenzene in the sediment ranged from a low of below detectable level of 0.66 mg/kg (7 of 21 samples) to a high of 114 mg/kg. All but one sample was at least 10 times lower than the MEG for hexachlorobenzene in soil. The Location "I" sample was re-extracted and along with its replicate analyzed. The holding time for these samples also exceeded 30 days, but hexachlorobenzene is essentially non-volatile and the results should not have been affected. Reanalysis of the same sample showed a value of about 50% less and the replicate was essentially the same. It is believed that the non-homogeneous make-up of sediment samples caused this variation. This is further confirmed by John Tobin, Jr., Operations Manager for BCM who explains the sample variations in that "This can only be attributed to non-homogeneous matrix and holding times", Attachment 4.

#### RINSE WATER

As required by USEPA Region IV Standard Operating Procedures and Quality Assurance Manual, appendix B, two rinse water samples from the ponar dredge were subjected to analysis. One rinse water sample was fixed with nitric acid which could only be analyzed for mercury. The results was 40  $\mu$ g/l which was below the mercury levels in the sediments and would not interfere with the sediment result. The second sample was not fixed and was analyzed for both mercury and organics. All organics were below detectable levels of 0.01 mg/kg. The mercury for the second rinse water sample was at 50  $\mu$ g/l which is below the level of mercury in the sediments and would not have interfered with the results.

#### TRIP AND FIELD BLANKS

Trip blanks from the laboratory were analyzed for both days along with field blanks for both days. All blanks were below detectable levels for all parameters.

#### QUALITY ASSURANCE AND QUALITY CONTROL

Complete copies of all analytical analysis are attached in Appendix 5. Included are the analytical results for the QA/QC samples including blanks, spikes, replicates, and laboratory QA/QC samples that meet or exceed the requirements of EPA's Contract Laboratory Program. [Note that in Volume I, the list of sample numbers located before the Laboratory Result Sheet has a typographical error. BCM No. 7A 30547 appears twice, causing an offset of one in list enteries after No. 2A 30547. The Laboratory Results Sheets have the correct BCM Number relative to Olin sample number (Location)].

## LABORATORY AUDIT

As part of the QA/QC program, Olin conducted an inspection and audit of the BCM Laboratory in Plymouth Meeting, Pennsylvania. The facility appeared to be adequately staffed and sufficiently equipped. A copy of the audit report is attached (Attachment 5).

#### SECTION V

#### CONCLUSIONS AND RECOMMENDATIONS

The following conclusions were drawn from the investigation and sampling plan:

- (1) No organic constituents were found in the water.
- (2) Mercury in the water was at or below the Primary Drinking Water Standard.
- (3) There were minor levels of mercury in the sediments. The mercury is not readily leachable.
- (4) There were no dichlorobenzenes (1,2 and 1,4 isomers) in the sediments.
- (5) The pentachloronitrobenzene in the sediments was below the MEG for soil divided by 10.
- (6) Except for a single point, all hexachlorobenzene samples in the sediment were below the MEG for soil divided by 10.
- (7) The single point for hexachlorobenzene in sediments upon reanalysis showed a value below the MEG divided by 10 as did the average of the two.
- (8) The single point for hexachlorobenzene above the MEG divided by 10 was probably due to a non-homogeneous sample.

In summary, results of the sampling and investigation of the Olin Basin indicate there is insignificant contamination. No further work is warranted.

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TABLE I WATER SAMPLE LOCATIONS

	Sample Numbe	
<u>Location</u>	Organics	Mercury
А	420 <sup>(1)</sup> 672 <sup>(3)</sup>	399 <sup>(1)</sup> 712 <sup>(3)</sup>
8	574 <sup>(1)</sup> 424	966 <sup>(1)</sup> 257
С	869 <sup>(1)</sup> 362	107 <sup>(1)</sup> 925
D	102 <sup>(1)</sup> 737	525 <sup>(1)</sup> 3 <b>49</b>
E	560 <sup>(1)</sup> 341 <sup>(2)</sup>	523 <sup>(2)</sup> 442 <sup>(2)</sup>
F	777 <sup>(1)</sup> 654 <sup>(2)</sup>	316 <sup>(1)</sup> 838 <sup>(2)</sup>
$G_{N}$	509 <sup>(1)</sup> 451	406 <sup>(1)</sup> 312
Gs	696 <sup>(1)</sup> 150	221 <sup>(1)</sup> 492
Rinse Water	281 <sup>(1)</sup> 981 <sup>(1)</sup>	281 <sup>(1)</sup> 981 <sup>(1)</sup>
Field Blank	878 <sup>(1)</sup> 942	283 <sup>(1)</sup> 908

- Designated for initial analysis as primary sample
   Designated for analysis as blind duplicat
   Designated for analysis as specified duplicate

TABLE II SEDIMENT SAMPLE LOCATIONS

Location	Sample Number
А	615 <sup>(1)</sup> 537 <sup>(3)</sup>
В	9 <b>41<sup>(1)</sup></b> 308
С	790 <sup>(1)</sup> 782
D	907 <sup>(1)</sup> 237
Ε	483 <sup>(1)</sup> 217 <sup>(2)</sup>
F	577 <sup>(1)</sup> 401 <sup>(2)</sup>
G <sub>N</sub>	267 <sup>(1)</sup> 919
Gs	538 <sup>(1)</sup> 507
н	183 <sup>(1)</sup> 532
I	807 <sup>(1)</sup> 384

- Designated for initial analysis as primary sample
   Designated for analysis as blind duplicat
   Designated for analysis as specified duplicate

TABLE III
FIELD SAMPLES SENT TO EPA

TYPE OF SAMPLE	OLIN SAMPLE NO.	SAMPLE LOCATION
Water (Organics)	279	С
Water (Mercury)	263	С
Sediment (Organics and Mercury)	343	Ε
Trip Blank (2 samples)	No Number	

# TABLE IV SAMPLES RECEIVED FROM EPA

TYPE OF SAMPLE	OLIN SAMPLE NO.
BNA H <sub>2</sub> 0 Spike	118
RNA H <sub>2</sub> O Blank	143
Metals Blank	136
BNA Sediment Blank	760
Metals Blank (Sediment)	810
BNA Sediment Spike	702
ICS	948

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TABLE V

MERCURY - WATER

(All values in ug/1)

Location	Concentration	Replicate Concentration	Comments
Α	1.0	1.0	Designated Rep.
В	2.0	NA	
С	0.7	NA	
D	0.7	NA	
Ε	0.6	< 0.2	Blind Rep.
F	0.7	0.6	Blind Rep.
$G_{N}$	0.4	NA	
Gs	0.5	NA	

NA - Not analyzed

TABLE VI ORGANICS - WATER

(All values in  $\mu g/1$ )

	1,2-Dic	hloro- enzene	1,4-Dic	hloro- nzene	Pentac nitrob		Hexach be	loro- nzene	
Location	Conc.	Rep.	Conc.	Rep.	Cond.	Rep.	Conc.	Rep.	Commments
Α	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	Designated Rep.
В	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	
С	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	
D	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	
Ε	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	Blind Rep.
F	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	Blind Rep.
Gs	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	
G <sub>N</sub>	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	

NA - Not Analyzed

TABLE VII

# MERCURY - SEDIMENT

<u>Replicate</u>							
Location	Total (mg/kg)	Extract (ug/l)	Total (mg/kg)	Extract (µg/1)	Comments		
Α	145	<0.2	<0.3	<0.2	Designated Rep.		
В	<del>2.1</del>	<0.2	2.65 <sup>(1)</sup>				
√c	૪૮.૧ <del>60.5</del>	<0.2	9.0 <sup>(1)</sup>	<0.2 <sup>(1)</sup>			
√D	2.56 1.55	<0.2	1.7 <sup>(1)</sup>	<0.2 <sup>(1)</sup>			
E	4.5	<0.2	9.5	<0.2	Blind Rep.		
F	€6.7 <del>25.5</del>	<0.2	8.0	<0.2	Blind Rep.		
G <sub>N</sub>	4.4 2.55	0.4	NA	NA			
Gs	4.9 <del>2.5</del>	<0.2	NA	NA			
н	3.95	<0.2	NA	NA			
I	17.1 <del>-11.0</del>	<0.2	4.0 <sup>(1)</sup>	<0.2 <sup>(1)</sup>			

NA - Not Analyzed (1) - Analyzed after 30 day holding time

TABLE VIII Dichlorobenzenes - Sediments

(All values in mg/kg)

Location		Rep.	1,4-Dichloro	Rep.	Comments
Α	0.35	<0.66	0.33	<0.66	Designated Rep.
В	<0.66	<0.66 <sup>(1)</sup>	<0.66	<0.66 <sup>(1)</sup>	
С	<0.66	<0.66 <sup>(1)</sup>	<0.66	<0.66 <sup>(1)</sup>	
D	<0.66	<0.66 <sup>(1)</sup>	<0.66	<0.66 <sup>(1)</sup>	
Ε	<0.66	<0.66	<0.66	<0.66	Blind Rep.
F	<0.66	<0.66	<0.66	<0.66	Blind Rep.
G <sub>N</sub>	<0.66	NA	<0.66	NA	
Gs	<0.66	NA	<0.66	NA	
н	<0.66	NA	<0.66	NA	
I	<0.66/<0.33 <sup>(2)</sup>	<0.33 <sup>(1)</sup> <	<0.66/<0.33 <sup>(2)</sup>	<0.33 <sup>(1)</sup>	

NA - Not Analyzed (1) - Extracted and analyzed after 30 day holding time (2) - Sample re-extracted and analyzed after 30 day holding time

TABLE IX

## HEXACHLOROBENZENE AND PENTACHLORONITROBENZENE - SEDIMENTS

(All values in mg/kg)

	Hexachloro	benzene		nitrobenzene	
Location	Conc.	Rep.	Conc.	Rep.	Comments
Α	31.5	35.3	5.72	11.7	Designated Rep.
В	2.4	2.1 <sup>(1)</sup>	<0.66	<0.66 <sup>(1)</sup>	
√c	21.0	1.9 <sup>(1)</sup>	<0.66	<0.66 <sup>(1)</sup>	
Ĵ	11.3	41.7 <sup>(1)</sup>	<0.66	14.5 <sup>(1)</sup>	
Ε	<0.66	<0.66	<0.66	<0.66	Blind Rep.
F	<0.66	<0.66	<0.66	<0.66	Blind Rep.
$G_{N}$	<0.66	NA	<0.66	NA	
Gs	<0.66	NA	<0.66	NA	
н	<0.66	NA	<0.66	NA	
I	114./69.6 <sup>(2)</sup>	57.5 <sup>(1)</sup>	4.9/<0.33 <sup>(2)</sup>	1.6 <sup>(1)</sup>	

NA - Not Analyzed (1) - Extracted and analyzed after 30 day holding time (2) - Sample re-extracted and analyzed after 30 day holding time

TABLE X

EPA SUPPLIED SAMPLES

Sample No.	EPA I.D.	Ana	lysis
118	BNA H <sub>2</sub> O Spike	1,2-Dichlorobenzene 1,4-Dichlorobenzene Hexachlorobenzene Pentachloronitrobenzene	<10.0 ug/l <10.0 ug/l <10.0 ug/l <10.0 ug/l
143	BNA H <sub>2</sub> O Blank	1,2-Dichlorobenzene 1,4-Dichlorobenzene Hexachlorobenzene Pentachloronitrobenzene	<10.0 µg/l <10.0 µg/l <10.0 µg/l <10.0 µg/l
136	Metals Blank	Mercury	<0.2 µg/1
810	Metals Blank	Mercury (Sediment)	<0.1 mg/kg
760	BNA Sediment Blank	1,2-Dichlorobenzene 1,4-Dichlorobenzene Hexachlorobenzene Pentachloronitrobenzene	<0.33 μg/l <0.33 μg/l <0.33 μg/l <0.33 μg/l
702	BNA Sediment Spike	1,2-Dichlorobenzene 1,4-Dichlorobenzene Hexachlorobenzene Pentachloronitrobenzene	<0.33 μg/l <0.33 μg/l <0.33 μg/l <0.33 μg/l
948	ICS	Mercury	<0.2 µg/1
301	Metals Spike	Mercury	2.0 µg/1

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# **ATTACHMENT 1**

- Although there is no apparent stressed vegetation in the wetland area and the current regulated plant effluent does not direct discharge into the basin, the wetland area is still a concern due to past activity. Since aerial photographs included in the site's Historical Analysis show direct effluent discharge into the basin prior to 1970, the basin must be considered as a possible receptor of contaminants. In addition to sampling efforts done as part of the 1977 Environmental Impact Assessment and bioassay tests performed as part of the NPDES permit requirement, the wetland area must satisfy CERCLA compliance. The CERCLA policy with regard to floodplains and wetlands is that RI/FS actions must meet the substantive requirements of the Floodplain Management Executive. Order (E.O. 11988), and the Protection of Wetlands Executive Order (E.O. 11990), and Appendix A of 40 CFR Part 6, entitled Statement of Procedures on Floodplain Management and Wetland Protection.
- o All monitor wells have been sampled and analyzed. The extent of ground water contamination has been identified and a remedial action plan proposed. This information is all available in the RCRA Post Closure Permit Application. In addition, approximately 5% of the wells have been subjected to Appendix VIII screening; these results are also available in the Post Closure Permit Application. Based upon the results of these actions, no further investigations should be required to satisfy CERCLA compliance.
- o With regard to public health risk associated with the site, information ascertaining the potential for risk, migration pathways, rates of migration, concentration and toxicity, was submitted to EPA on August 8, 1985 in the Exposure Information Report as required by EPA Regulation 40 CFR 270.10(j).

In conclusion, the results of the previous studies and current corrective actions performed under RCRA compliance have addressed the areas of concern in sufficient detail to satisfy the RI/FS requirements of CERCLA compliance

Section: 4
Date: 6/6/86

with the exception of the CERCLA policy requirements with regard to protection of wellands and 40 CFR Part 6. 3 8 0140

This area should be included in any future plan of action in order to satisfy CERCLA compliance requirements. The best course of action would be to include the wetlands within the RCRA compliance activities if possible. If not, the wetlands should be addressed in a separate CERCLA plan of action.

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**ATTACHMENT 2** 



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION IV

#### 343 COURTLAND STREET ATLANTA, GEORGIA 30365

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4WD-RCRA

Mr. Arnold Feldman Olin Chemicals McIntosh Plant McIntosh, Alabama 36553

RE: Study Plan and Investigation, Olin Basin McIntosh, Alabama Facility

MCINTOSN, Aladama Facility EPA I.D. No. ALD 008 188 708

Dear Mr. Feldman:

We have reviewed your revised Basin Study Plan, as submitted October 22, 1987, and hereby approve procedures described therein. Our only technical comment at this time refers to item #6 on the October 22, 1987, cover letter. A nitric acid solution to be used for preservation of the mercury water samples should be pH < 2 in accordance to SW-846 Test Method 7470; September 1986.

Please contact Mr. Harold Vincent at (404)347-3433, for any questions you may have.

Sincerely yours,

James H. Scarbrough, P.E.

Chief, RCRA Branch

Waste Management Division

cc: Daniel E. Cooper, Alabama Department of Environmental Management

Rec's—Date ////3/87
Environmental Dept. 350

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**ATTACHMENT 3** 



4WD-SFB

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION IV 345 COURTLAND STREET ATLANTA, GEORGIA 30365

RECEIVED

NOV 3 0 1987

A L FELDMAN

Mr. Arnold Feldman
Environmental Affairs Associate
Olin Chemicals
P.O. Box 248
Charleston, TN. 37310
(615) 336-4510

Dear Mr. Feldman:

I am writing in reference to the overview of the Basin Study Plan which must be provided by the Environmental Protection Agency Environmental Services Division (EPAESD) to insure adherence to Quality Control/Quality Assurance (QA/QC) of sampling and sample analysis for the EPA to accept the sampling data. These guidelines are outlined in the Standard Operating Procedures and Quality Assurance Manual - USEPA, Region IV, Engineering Support Branch, April 1, 1986.

To insure QA/QC of sampling methodologies, Charles Till (EPAESD) and I will be at the basin to observe sampling which is scheduled to begin on Tuesday December 8th at 7:00 am.

To insure the QA/QC of sample analysis, the EPAESD will provide sample spikes and blanks to account for ten (10) percent of the samples sent to the contract laboratory. The EPAESD will also split ten (10) percent of the samples to analyse for comparison to the contract labs analysis. The EPAESD will use sample bottles from Olin for the spikes, blanks, and splits to insure the samples maintain the same integrity. The cost of analysis of the spikes and blanks sent to the contract lab will will be assumed by Olin Chemicals.

Olin Chemicals must consent with the overview and acceptance of spikes and blanks to the contract lab or the EPA can not be assured of QA/QC and will not accept the sample analysis data.

If there are any questions or comments on the overview of the Basin Study or acceptance of the spikes and blanks, please call me at (404) 347-2643.

Sincerely,

John A. Trudell III, SPM

Olin Chemicals Site, McIntosh

cc: Ms. Toni B. Odom, Olin Chemicals, McIntosh

Mr. Charles Till, EPAESD

**ATTACHMENT 4** 



# BCM Eastern Inc.

A. L. FELDMAN

Engineers, Planners and Scientists

One Plymouth Meeting • Plymouth Meeting, PA 19462 • Phone: (215) 825-3800

March 29, 1988

Olin Chemicals P. O. Box 248

Charleston, TN 37310

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Attn: Arnold L. Feldman

Dear Sir:

Enclosed within the report are the results and data for the samples submitted by Olin Corporation personnel to BCM Laboratory.

Sampling was conducted at the McIntosh, Alabama plant for both organic and inorganic analysis. Each instance of sampling was given a unique numerical identification by the field sampling personnel. A sampling is defined as any sample taken, even two separate aliquot from the same location with different matrix modifications were uniquely numbered.

The samples were received at the Laboratory on December 8, 1987, December 10, 1987, December 11, 1987, and December 12, 1987 by BCM's Sample Controller. The samples were of two different matrixes, aqueous and sediment or semi-solid. Each sample was logged into the Laboratory's sample and data management system assigning a unique BCM sample I.D. number to each sample referencing the client I.D. number. The samples for Login were selected from the shipments based upon chain-of-custodies and instructions shipped with the samples and verbal communications via telephone from field sampling personnel for discrepancies.

Methods used can be referenced in "Standard Methods for the Examination of Water and Wastewater" 16th Edition, 1985, USEPA SW-846 "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" September 1986; referencing SW-846 "Test Methods for Evaluating Solid Waste Physical/Chemical Methods" March 1982. The particular methods are listed below:

#### DESCRIPTION

#### METHOD NUMBER

Mercury in Sediment and Water	EPA#7471 or EPA#245.1
Gas Chromatography/Mass Spectrometry	
for Semivolatile Organics	EPA# 8270
pH Water	EPA# 9040
pH Soil	EPA# 9045
EP Toxicity Extraction	SW-846 Chapter 7 Sec. 4
Total, Fixed & Volatile Solids	
in Solid and Semi-Solid	Std. Methods 209F
Specific Gravity	Std. Methods 213E



No real difficulties were encountered during the analysis. The results of all the sediment samples are in a dry weight basis on our tabular result sheets. The only difficulty was sample A30505 was not analyzed for semivolatiles because the only aliquot received contained HNO3 as a preservative.

The sample locations on which matrix quality control was performed are listed below:

OLIN LOCATION NUMBER	BCM I.D. NUMBER
Duplicate of 702	A30553
Spike of 702	A30554
Duplicate of 810	A30555
Spike of 810	A30556
Duplicate or 112	A30545
Spike of 112	A30546
Duplicate of 136	A30547
Spike of 136	A30548
Duplicate of 267	A30528
Spike of 267	A30529
Duplicate of 577	A30509
Spike of 577	A30510
Duplicate of 312	A30406
Spike of 312	A30400
Duplicate of 672	A30416
Spike of 492	A30398
Duplicate of 150	A30402
Spike of 150	A30401
Spike of 451	A30404

Results of Spike and Duplicate analysis can be found summarized in the body of the report. For Mercury, the results are on sheets titled "BCM Laboratory Duplicate Sample Analysis" and "BCM Laboratory Spike Sample Analysis" and for organics on forms titled "Water Semivolatile Matrix Spike/Matrix Spike Duplicate Recovery" and "Soil Semivolatile Matrix Spike/Matrix Spike Duplicate Recovery". All recoveries were within specifications.

Upon the request of Olin (see attached conversation record) after initial results were reviewed, samples were reanalyzed. One of the samples, BCM number A30499, Olin I.D. 807 was reanalyzed for Semivolatiles. The reanalysis (BCM Number 801095) showed lower results which were significantly different. This can only be attributed to non-homogenous matrix and holding times.

Should you have any questions, please do not hesitate to contact me or my staff.

John JO Tobin Jr. Operations Manager

Client:	Olin Chem	ical McIntosk	Job No:
Name:			Date: 1/14/88
Spoke To:_	ARnie Feld 12/87 Sa	mor	Phone No:
Subject:	12/87 Sa	mples	
Type Call: NOTES:	Incoming Outgo	oing	
	Ofter Revie	wing prelimina	ky data on
	the above S	wing flelimina samples, Aknie ving:	Requested
	the follor	ving:	
	, ,		807 for organics
	Anal	yre Samples 3	08, 782, 237, 384
		(Hg, ORGANICS,	08, 782, 237, 384 Sediment Scan Sp. Cond, % Moishure)
	Inform	ed April tha	t these Samples
	had led	anded holding	70mes. M
	LE COURSE	inds but wants	s us to Run them

# **ATTACHMENT 5**

# OLIN CORPORATION QUALITY ASSURANCE REPORT McINTOSH ALABAMA BASIN

APR 1 5 1988
A L FELDMAN

#### LABORATORY - FACILITIES AUDIT

I. SUMMARY

3 8 0150

A quality assurance audit of laboratory facilities was performed as part of the Investigation of the McIntosh Alabama Olin Basin site. The results of this review of laboratory facilities are described below.

#### II. LABORATORY AND FACILITIES AUDIT

A laboratory and facilities audit of BCM Laboratories (Plymouth Meeting, Pennsylvania) was conducted by Olin personnel (QA Project Specialist and Project Manager) on December 11, 1987. The laboratory director, laboratory manager and client services coordinator were present from BCM Laboratories. Several of the staff members who performed the actual analyses were also interviewed. The facilities and equipment were evaluated during a tour of the laboratories. Supporting information (i.e., on-site laboratory evaluation sheets, resumés and corporate qualifications) submitted during the audit remain on file.

In general, the laboratory facilities at BCM Laboratories appear to be adequately staffed and sufficiently equipped for the types of analysis being performed (i.e., mercury and GC/MS). Responses of several staff members during the audit indicate that these personnel are aware of the quality assurance requirements for this project.

cc: J. C. Brown
D. L. Cummings

LMM/jmm 3/9/88 099 Revised 4/12/88





# APPENDIX 1 STUDY PLAN AND INVESTIGATION

# STUDY PLAN AND INVESTIGATION OLIN CORPORATION MCINTOSH, ALABAMA

OLIN BASIN

**Approvals** 

Project Manager:

J. C. Brown

Quality Assurance Officer:

Manager, S.E. Regional Environmental Affairs:

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#### SECTION I

# INTRODUCTION

The purpose of this plan is to conduct a study of potential releases of hazardous constituents to the Olin Basin to satisfy the requirements of 40 CFR 264.101 of RCRA and to provide Remedial Investigation information for CERCLA in response to the Final Forward Study Report, June 6, 1986 (Document Control #268-WPI-RT-CUZY-1).

This document presents the sampling plan, guidelines, specifications and quality assurance program which describe the Study Plan and Investigation of the Basin at Olin Corporation's McIntosh Alabama facility. The level of quality assurance, i.e., the number of blanks, spikes and replicates meets or exceeds the requirements of the EPA's Contract Laboratory Program.

The work requires the sampling and analysis of the surface water and sediments within the Olin Basin. These activities can be divided into five groups:

- 1) Sampling of Sediments
- 2) Sampling of Surface Water
- 3) Analysis of Samples
- 4) Laboratory Quality Assurance/Quality Control
- 5) Report Preparation

# SECTION II PROJECT RESPONSIBILITY

# PROJECT MANAGER (PM):

Responsible for total project management including:

- Overall responsibility for management of the analytical program and the validity of all data.
- Selecting and reviewing all analytical protocols required for measuring and monitoring.
- Selection of analytical laboratory.
- Directing the activities of internal and external analytical laboratories used for project.
- Reviewing all QA/QC results with QA officer.
- Directing the field sampling.
- Preparing all reports and recommendations.

# FIELD PROJECT OFFICER (FPO)

The following are included in this function:

- Assumes responsibility of Project Manager in field during absence of Project Manager.
- Responsible for Safety, Health and Security of Field Sampling Team.
- Responsible for training of Field Sampling Team.
- Responsible for reviewing and advising on all aspects of field QA/QC.
- Assisting in specifying field QA/QC procedures to be used during the program.
- Responsible for evaluating and recommending corrections to field sample custody procedures.
- Responsible for evaluating and recommending corrections in field sampling and/or field analytical techniques.
- Verifying that field analytical QC procedures are being followed as specified in the QA/QC program.
- Participating in the field analytical/sampling audits.

# SAMPLING COORDINATOR (SC)

Responsible for coordinating field activities and delivery of samples to the Analytical Laboratory.

- Determining appropriate sampling equipment and sample containers to minimize contamination.
- Training and qualifying field personnel in sampling procedures and field analytical procedures, prior to taking samples.
- Ensuring that samples are collected, labeled, preserved, stored, and transported as specified in the Study Plan.
- Checking that all sample documentation (labels, field notebooks, chain-of-custody records, packing lists) is correct and transmitting that information with the samples to the Analytical Laboratory.
- Verifying that field analytical QC procedures are being followed as specified in the QA/QC plan and preparing field QC data for review by Project Manager.
- Participating in field analytical/sampling quality audits.

# QUALITY ASSURANCE OFFICER (QAO)

- Responsible for reviewing and advising on all aspects of QA/QC.
- Assisting the Project Manager in specifying QA/QC procedures to be used during the program.
- Making external and internal QC evaluations and reviewing QA/QC procedures and if problems are detected, making recommendations to the Project Manager, or Contract Laboratory Coordinator concerning repeat samples and analyses and/or procedure changes.
- Responsible for evaluating and recommending corrections to sample custody procedures.
- Responsible for informing the Project Manager that appropriate QA/QC procedures have been established and are being implemented by the Sampling Coordinator and Contract Laboratory Coordinator.
- Responsible for evaluating and recommending corrections in sampling and/or analytical techniques.
- Responsible for evaluating validity of finished data and reporting the results of the evaluation to the Project Manager.

# ANALYTICAL LABORATORY COORDINATOR (ALC)

- Responsible for selecting Contract Laboratory based upon recommendations of Project Manager, Field Project Officer and Quality Assurance Officer.
- Responsible for obtaining contract with outside laboratory.
- Acts as interface between Project Manager and Contract Laboratory Coordinator.
- Responsible for timely function of contract laboratory in meeting laboratory milestones.

# CONTRACT LABORATORY COORDINATOR (CLC)

Responsible for the contract laboratory's analytical activities. These include:

- Training and qualifying personnel in specified laboratory QC and analytical procedures, prior to receiving samples.
- Verifying that laboratory QC and analytical procedures are being followed as specified in the specific QA plan and reviewing sample and QC data. This review will include examination of raw data such as chromatograms and checking of arithmetic calculations of the samples analyzed, as well as inspection of reducted data, calibration curves and bound laboratory notebooks.

- Informing the Project Manager and/or QA officer if the review indicates a decline in data quality that appears to warrant repeat analysis of some or all samples.
- Receiving samples from the field and verifying that incoming samples correspond to the packing list or chain-of custody sheet.
- Maintaining records of all incoming samples, tracking those samples through subsequent processing, analysis, and ultimately appropriate disposal of those samples at the conclusion of the program.
- Preparing quality control samples for analysis prior to and during the program.
- Preparing QC and sample data for review by the Project Manager and QAO.
- Review of raw data with laboratory chemist, against calibration and QC records.
- Approval of finished data as meeting the quality objectives of the project.
- Preparing QC and sample data for transmission to the Project Manager.
- Preparing and shipping sample shuttles to Field Project Officer. Shuttles to include all containers, labels, seals, trip blanks and ice packs as specified on the Site Investigation Plan.

#### SECTION III

### SAMPLE LOCATIONS

#### I. WATER

Sample Basin surface water at eight locations as shown on Olin Drawing No. SKD-10-10-38. The locations, described below, were selected on the basis of:

- (1) Relationship to Basin discharge
- (2) Relationship to original effluent ditch location
- (3) Overall coverage of Basin
- A. Current effluent ditch below Basin discharge including current effluent and basin discharge.
- B. Old effluent ditch into Basin
- C. North shallow area adjacent to old effluent ditch into Basin
- D. South shallow area adjacent to old effluent ditch into Basin
- E. North Basin area
- F. East Basin area
- G. North and South deep areas

# II. SEDIMENT

Sample for sediment at ten locations as shown on Olin Drawing No. SKD-10-10-39. The locations, described below, were selected on the basis of:

- (1) Relationship to Basin discharge
- (2) Relationship to original effluent ditch location
- (3) Relationship to possible sediment deposition
- (4) Overall coverage of Basin
- A. Current effluent ditch below Basin discharge including current effluent and Basin discharge.
- B. Old effluent ditch into Basin
- C. North shallow area adjacent to old effluent ditch into Basin
- D. South shallow area adjacent to old effluent ditch into Basin
- E. North Basin area
- F. East Basin area
- G. North and South deep water areas
- H. North grass area adjacent to old effluent ditch into Basin
- I. South grass area adjacent to old effluent ditch into Basin

# III. GENERAL

As stated above, the eight Basin water sample locations will also be sampled for sediment. To minimize disturbance to these sample locations, the following procedure will be followed:

- 1) Measure depth of water
- 2) Take water sample(s) see Sampling Methodology Section (Section VI)
- 3) Mark sampling point with buoy
- 4) Wait minimum of 24 hours
- 5) Take sediment samples see Sampling Methodology Section (Section VI)

Specific sampling points for deep water, North Basin and East Basin will be selected in the field predicated on water depth, sediment depth and field accessibility. Actual sampling location could vary by  $\pm 300$  feet from that shown on Olin Drawing SKD-10-10-38 and SKD 10-10-39.

Actual sampling points will be marked on Topographic Map which will be submitted with the final report (see Investigation Report Section IX).

#### SECTION IV

## **PARAMETERS**

Olin has selected five parameters that all samples will be analyzed for. They are as follows:

- 1) Mercury
- 2) 1,2-Dichlorobenzene (orthodichlorobenzene)
- 3) 1,4-Dichlorobenzene (paradichlorobenzene)
- 4) Hexachlorobenzene (HCB)
- 5) Pentachloronitrobenzene (PCNB)

Water samples will be analyzed for total mercury while sediment samples will be analyzed for total and EP extractable mercury.

## Mercury

Mercury was selected as a parameter for two reasons: Olin operated a Mercury Cell Chlorine/Caustic Soda plant at McIntosh from 1952 through 1982, and Olin discharged the NPDES wastewater from the Mercury Cell plant into the Basin until 1976.

# 1,2 and 1,4 - Dichlorobenzene

1,2 and 1,4 - Dichlorobenzene (the ortho and para isomers) were selected as parameters because they were a by-product of the Crop Protection Chemical (CPC) facility at McIntosh.

### **Hexachlorobenzene**

Hexachlorobenzene was selected because it was a by-product of the CPC facility at McIntosh. Blocks of Hexachlorobenzene were used for erosion control on the edges of the main East-West ditch and in the effluent ditch approximately mile east of the main plant. Both ditches are part of the NPDES effluent system. All hexachlorobenzene in these ditches was removed in 1977.

#### Pentachloronitrobenzene

From 1956 until 1982, one of the main products of the CPC facility was Pentachloronitrobenzene. As a condition of NPDES permit (No. AL0001945), Olin was required to sample, analyze and report on the discharge when the facility was operating.

#### SECTION V

#### DOCUMENTATION

Olin will meet or exceed the documentation requirements for the sampling and analysis of the Basin as specified in: 1) <u>Test Methods for Evaluating Solid Waste</u>, SW-846, 2) <u>Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, QAMS - 005/80</u>, and 3) <u>Standard Operating Procedures and Quality Assurance Manual - USEPA</u>, Region IV, Engineering Support Branch, April 1, 1986.

Specifically, Olin's program consists of three parts: (1) Field Log Book, (2) Sample Seals and Labels and (3) Chain-of-Custody Records.

# Field Log Book

A Field Log Book (hard cover) with prenumbered pages will be kept to record all information pertinent to the sampling. At a minimum, the following will be entered:

- 1) Date
- 2) Observable weather conditions (sunny, cloudy, etc.)
- 3) Observable Basin condition (clear, muddy, etc.)
- 4) Sampling team members names
- 5) Sample location
- 6) Sample type (water, sediment)
- 7) Water depth, temperature, pH
- 8) Description of sampling point
- 9) Time sample collected

- 10) Sample number
- 11) Number and volume of samples taken
- 12) Sampling methodology
- 13) Field Preservation, if any
- 14) Sample distribution and how transported
- 15) Signatures of sampling team members

In addition, records of conversation, if any, between Olin and the analytical laboratory will be documented in the Field Log Book.

# Sample Seals and Labels

To prevent misidentification of samples, self-sticking vinyl labels will be supplied by the laboratory which will include the following information:

- 1) Sample number
- 2) Sample identification
- 3) Sample type
- 4) Name of collector
- 5) Date and time of collection
- 6) Place of collection
- 7) Sample Preservation Information
- 8) Analysis required
- 9) "Olin Corporation, McIntosh, Alabama"

After sampling, the labels will be affixed to the sample bottles in the field.

After sample collection, each bottle will be sealed in such a way that it is necessary to break the seal to open the sample container. The seal will be a signed custody seal that will contain at least the sample number, date, time, location and name of collector.

# Chain-of-Custody Records

To establish and maintain the documentation necessary to trace sample possession from the time of collection through analysis, a Chain-of-Custody Record will be filled out and accompany every sample. Olin-McIntosh will use its standard Chain-of-Custody Record form which is attached in Section XI. Completed copies of the record will be requested from the analytical laboratory to accompany their final report. The completed Chain-of-Custody records will then be appended to the Field Log Book. The "Remarks" section on the chain-of-custody will specify the analyses to be performed on each sample.

# SECTION VI SAMPLING METHODOLOGY

Detailed below are the specific sampling methodologies and sample preservations that will be used to collect the water and sediment samples. All samples will be split in the field (including the field blanks) to insure delivery of an undisturbed sample in case of sample bottle breakage during transportation to the laboratory. Only one of each sample will be analyzed. It is estimated that the water samples can be taken in 1-2 days depending upon weather conditions and accessibility and that the sediment samples can be taken in 2-3 days.

# Water Sampling

- Measure depth of water using weighted measuring tape, measuring pole or similar device.
- 2) Measure pH of water using Method 150.1 from <u>Methods for Chemical Analysis</u> of Water and Wastes, EPA-600/4-79-020, (copy attached in Section XI).
- 3) Measure temperature of water using Method 170.1 from Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, (copy attached in Section XI).
- 4) A depth integrated water sample will be taken using the Weighted Bottle (<u>Test Methods for Evaluating Solid Waste</u>, SW-846, Third Edition, page NINE-50). Vertical subsamples will be composited to form a single sample. The number of vertical sub-samples and the depths at which sub-samples will be taken will be at the discretion of the Sampling Coordinator.

# Sediment Sampling

- 1) Measure temperature of water using Method 170.1 from Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, (copy attached in Section XI).
- 2) Measure pH of water using Method 150.1 from <u>Methods for Chemical Analysis</u> of Water and Wastes, EPA-600/4-79-020, (copy attached in Section XI).
- 3) A Phleger corer, Ponar dredge or similar device will be used to obtain a 0-6" sediment sample.
- 4) The sediment sampling device will be:
  - a) Precleaned pursuant to <u>Cleaning Procedures for Stainless Steel</u> and <u>Metal Sampling Equipment</u> (Standard Operating Procedures and Quality Assurance Manual, Appendix B.4).
  - b) Cleaned between samples pursuant to <u>Field Equipment Cleaning</u>

    <u>Procedures</u> (Standard Operating Procedures and Quality Assurance

    <u>Manual</u>, Appendix B.8.3).

# Sample Preservation and Collection

Sample bottles and preservation of individual samples will be pursuant to the requirements for each parameter's specific methodology in <u>Test Methods for Evaluating Solid Waste</u>, SW-846, USEPA. Briefly these are:

- 1) Mercury Water: Sampled and stored in polyethylene containers with polyethylene cap. Samples will be acidified to a pH of less than 2.0 with 70% ACS reagent grade nitric acid. Samples will be iced or refrigerated from the time of sampling until analysis. Samples will be analyzed within 38 days of collection.
- 2) Mercury Sediment: Samples stored in glass containers with teflon-lined caps. Samples will be iced or refrigerated from the time of sampling until analysis. Samples will be analyzed within 40 days of collection. Samples will be dried in an oven at a temperature of 60°C.
- 3) Ortho and para dichlorobenzene, pentachloronitrobenzene and hexachlorobenzene Water and Sediment: Samples will be taken in glass containers with Teflon-lined screw caps. Samples will be iced or refrigerated at 4°C from the time of sampling until extraction. Samples will be extracted within 7 days of collection and analyzed within 40 days of extraction.

#### SECTION VII

## ANALYTICAL METHODOLOGY

An outside contract laboratory will be selected by Olin to analyze the samples based on the laboratory's overall analytical capability, capability to analyze for the required parameters and familiarity with Olin-McIntosh samples. The laboratory will be required to follow (and document to Olin) all USEPA procedures under the contractor laboratory program, USEPA Region IV SOPQAM and USEPA procedures for the specified methodologies. The laboratory will be required to supply Olin with all sampling bottles, shuttles and trip blanks. The laboratory will also supply Olin (under separate cover) the water to be used for the field blanks. The laboratory will assure proper precleaning of sample bottles and laboratory equipment prior to usage.

All analysis will be performed pursuant to:

- 1) Test Methods for Evaluating Solid Waste, SW-846, USEPA, November 1986,
  Third Edition hereafter referred to as "SW-846" or,
- 2) Standard Methods for the Examination of Water and Wastewater, Sixteenth Edition, 1985, American Public Health Association hereafter referred to as "Standard Methods" or.
- 3) 40 CFR 261 Appendix II EP Toxicity Test Procedure (Revised 46 FR 35247, July 7, 1981) hereafter referred to as "EP Extract"

All sediment samples will be homogenized and split at the laboratory. One split will be run for the specified chemical analysis detailed below and the second split will be run for Percent Moisture and Specific Gravity. The Standard Methods will be used for Moisture and Specific Gravity utilizing Method 209A, "Total Solids Dried at 103-105°C" (pg. 93) and Method 213E, "Specific Gravity" (pg. 132) respectively or equivalent methods approved by Olin: copies of the methods are attached in Section XI. Results of all sediment samples will be reported on a dry weight basis.

Water samples for mercury will be analyzed using SW-846 Method 7470 (attached Section XI). Sediment samples for mercury will be run using SW-846 Method 7471 (attached Section XI) for total mercury and EP Extract for leachable mercury.

Analysis for ortho and para dichlorobenzene, hexachlorobenzene and pentachloronitorbenzene will be done using SW-846 Method 8250 GC/MS Method for Semivolatile Organics: Packed Column Technique (attached Section XI) or equivalent USEPA method approved by Olin prior to use.

# SECTION VIII QUALITY ASSURANCE/QUALITY CONTROL

#### QUALITY ASSURANCE/QUALITY CONTROL OBJECTIVES

The overall objective of the Quality Assurance/Quality Control (QA/QC) Program is to insure that the analytical results are reliable, reproducible, and accurate. To this end, a series of specific objectives for each step of handling, preparing, analyzing, and documenting the samples collected for this project has been established. The basis of the quality assurance program is the establishment of methods to be followed in producing an analytical result for a sample.

All data will be reported in consistent units to allow comparison with similar data. Quality assurance samples, replicates, spikes, and standards calibration will be used to validate the method in the laboratory. Changes in methods will be reported with reasons and QA/QC results suitable to support the change; this will include, when appropriate, verification or validation data.

Analytical methods frequently prescribe specific quality assurance procedures for the method. Where the procedures of the method conflict with the procedures in this manual, the more stringent procedures will control.

Table I (end of Section VIII) presents the Summary of Precision, Accuracy and Completeness Objectives.

Accuracy is defined as the degree of agreement of a measurement or average of measurements with an accepted reference or true value, for the execution of a method in a particular laboratory using an interference-free matrix. In general, accuracy goals for this project determine errors due to instrument response and incomplete preparation recoveries can be corrected for, and so that the primary uncertainties in the analytical data are due to random errors not exceeding those appearing in the reference in Table 1. For this project, the QA objectives for accuracy are expressed in terms of the following parameters:

- Reference Materials: All reference materials used as calibration standards or surrogate compounds will be the highest purity commercially available (usually greater than 98%) and must be certified by the supplier. The standards will be cross-referenced to appropriate EPA EMSL standards, where available.
- Instrument Performance: Each instrument used in this project will be checked on each day that samples are analyzed to demonstrate performance. One of the QA objectives is that the absolute instrument response [e.g. area counts/ng injected for the standard(s)] shall be within 20% of the last day's calibration and 50% of the value of the initial calibration provided that the precision of the measurement meets the QA/QC criteria.
- Recovery of Compounds: Recovery is the degree of agreement of a measurement or average of measurements of field samples to which a known amount of analyte has been added (this should be added at the level specified in the method) compared to the sum of the measurement of the

analyte in the field sample before addition and the amount of analyte added. The recovery of the analytes or interest will be defined as follows:

Recovery,% =  $(\underline{ug} \text{ found in spiked sample - } \underline{ug} \text{ in native sample}) \times 100)$   $\underline{ug} \text{ added to sample}$ 

The specified numerical targets for recovery of the analytes are given in the reference in Table 1.

Precision is defined as a measure of mutual agreement among individual measurements of the sample property. A final QA objective is that the results of the analysis of spiked levels of the analytes in laboratory replicate sample be within the limits specified in the reference on Table I, when replicate spiked samples are analyzed.

Completeness is a measure of the amount of valid data obtained from a measurements system compared to the amount that was expected to be obtained under correct normal conditions. This QA objective is defined in Table I.

The sampling will be performed so as to best obtain a true picture (representation) of the basin. Some of the factors that are addressed by the included protocol are mixing of samples and sample preservation.

Sample site selection and sampling procedures and equipment are addressed in the Sample Location Section (Section III).

Concentration data will be reported in mg, ug, or ng or analyte per liter for water and per kilogram for sediments of original sample. pH will be reported to nearest 0.1 pH unit. When precise recovery values for a given component are known, the recovery information will also be provided.

Full documentation of the analyses performed will be kept in notebooks, including traceability of standards. These notebooks will be available for inspection at the contract laboratory and for field notes at Olin Corporation, Charleston, Tennessee.

# FIELD & TRIP BLANKS

The outside laboratory will be required to supply a trip blank (split to insure sample integrity) in each sample shuttle supplied to Olin. Olin will supply a field blank (split to insure sample integrity) in each sample shuttle returned to the laboratory. The blanks will be run for total mercury, ortho and para dichlorobenzene, hexachlorobenzene and pentachloronitrobenzene using the methods specified in the Analytical Methodology Section.

# **BLIND REPLICATES**

Two blind field replicates for water and two field blind replicates for sediment (all split to insure sample integrity) will also be sent to the laboratory for the specified parameters. This represents approximately a 20% replicate analysis. These replicates will be split from field samples by the field sampling team.

#### SPIKE RECOVERIES

The contract laboratory will spike all samples with a surrogate standard. Percent recoveries will be calculated and reported for all samples. This is a 100% spike recovery quality control check.

Laboratory split samples from two water and two sediment samples will also be spiked and recovery of total mercury determined. The splits will utilize analytical methodology, SW-846 Method 7470 and 7471 for water and sediment respectively. This represents approximately a 20% spike and recovery.

## CONTRACT LABORATORY QA/QC

The outside laboratory will be required to supply Olin with their QA/QC program that at a minimum meets the Contract Laboratory Program, SW-846, Method 7470, Method 7471 and Method 8250 requirements. The laboratory will also supply Olin with their minimum detection levels that at least meet EPA Laboratory Guidelines for all parameters and surrogates.

In addition, the laboratory will supply Olin with their QA/QC data and results for the days that analysis of Olin samples are run. This will include all gas chromatograms of Olin samples, replicates, blanks, spikes and the daily laboratory QA/QC data.

# CALIBRATION PROCEDURES AND FREQUENCY

See Analytical Procedures for the details of instrumental calibration.

- The calibration curve for all organic analyses will comprise five standards.

If any calibration point varies by more than 20% from the last day's calibration or 50% from the initial calibration curve, corrective action(s) will be taken, i.e., electronic repair, new calibration, spectrometer retuned, GC column change, etc.

- Calibration procedures for all other parameters will be those specified by the method reference.
- Field instruments will be calibrated daily according to the procedure specified by the reference method.

#### DATA VALIDATION

The principal steps that will be used to verify the data integrity during collection and reporting of data are:

Raw data generated by the laboratory chemist will be reviewed with the Laboratory Supervisor/CLC. Raw data will be reviewed against calibration and QC records to ensure the adequacy of documentation and the reliability of the data. These reviews will take place on not less than a weekly

basis. The raw data will be considered finished data when the review has been successfully completed. The finished data and QC data will be reported to the PM.

- The QAO will review finished data to ensure that QA/QC requirements have been met. These reviews will be performed on a random basis in conjunction with the PM and CLC/Laboratory Supervisor. The QAO will report the conclusions of the review to the PM. The data will be considered validated when the review has been successfully completed. The QAO report will be included with the report of the data.
- The PM will consider all finished and validated data. Invalid data will be flagged and will not be reported by the Project Manager. The fact that data has been invalidated and the reasons will be reported and maintained by the Project Manager.
- PM, CLC and laboratory supervisor may request additional confirmation, if deemed necessary for site specific indicators.

All results will be reported by the CLC to the Project Manager who will then forward the data to the appropriate parties. The reporting format will be as specified in EPA Contract Laboratory Program guidance.

The raw data will be calculated by the appropriate analytical chemist in the laboratory and the finished data will be reviewed and supplied by CLC to the PM.

All data generated will be included in written reports of the program. The storage of these reports will be the responsibility of the PM.

The storage of all laboratory notes and chromatograms in accessible forms will be the responsibility of the contract laboratory coordinator.

# CONTRACT LABORATORY AUDIT

At least one performance audit will be made of the contract laboratory during the life of the project. The audit will be performed by the Project Manager and/or the Quality Assurance Officer. The audit will be done to ensure that the laboratory is meeting the minimum requirements of the Contract Laboratory Program and the requirements of this plan.

SUMMARY OF PRECISION, ACCURACY AND COMPLETENESS OBJECTIVES

TABLE I

Measurement Parameter	Method Reference	Exp. Conditions	Precision Standard Deviation	Accuracy Compl	eteness
Temperature (Field)	EPA 170.1	Water	as per reference	as per reference	95
pH(Field)	EPA 150.1	Water	as per reference	as per reference	95
Semi-Volatile Organics	EPA 8250 SW 846	Water & Sediments	as per reference as per reference	as per reference as per reference	90
Moisture (Total Solids)	EPA 209A	Sediments	as per reference	as per reference	95
Specific Gravity	EPA 213E	Sediments	as per reference	as per reference	95
Mercury	Method 7470 SW 846	Water	as per reference	as per reference	90
Mercury	Method 7471 SW 846	Sediments	as per reference	as per reference	90
Mercury (EP Extract)	Appendix II 40 CFR 261	Sediments	as per reference	as per reference	90

010/ALF5

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#### SECTION IX

# INVESTIGATION REPORT

Olin will prepare and submit a report to the USEPA on the investigation within 8 weeks of receipt and review of the analytical data. The report will include: a summary of the sampling program including any significant field notes and a map showing the exact sampling locations; complete analytical results including QA/QC data; an evaluation of the analytical results; and conclusions based upon the investigatory program. The conclusions will include recommendation for any further work.

ALF/wsr 010/ALF5

#### SECTION X

#### REFERENCES

- 1. Test Methods for Evaluating Solid Waste, SW-846, USEPA, November 1986, Third Edition.
- 2. Standard Methods for the Examination of Water and Wastewater, Sixteenth Edition, 1985, American Public Health Association.
- 3. 40 CFR 261 Appendix II EP Toxicity Test Procedure, Revised 46 FR 35247, July 7, 1981.
- 4. Interim Guidelines and Specifications for Preparing Quality Assurance Project Plansk QAMS 005/80, December 1980, USEPA.
- 5. Standard Operating Procedures and Quality Assurance Manual, April 1986, USEPA, Region IV.
- 6. Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, March 1979, USEPA.

010/ALF5 8/07/87 APPENDIX 2
FIELD SAMPLING NOTES

## Field Book

## INDEX

<sup>3</sup> roperty of	Olin Corporation
	Environmental Affairs Det. P.O. Box 248
Address .	Charleston TN 37310
Telephone .	615 - 336 - 4000

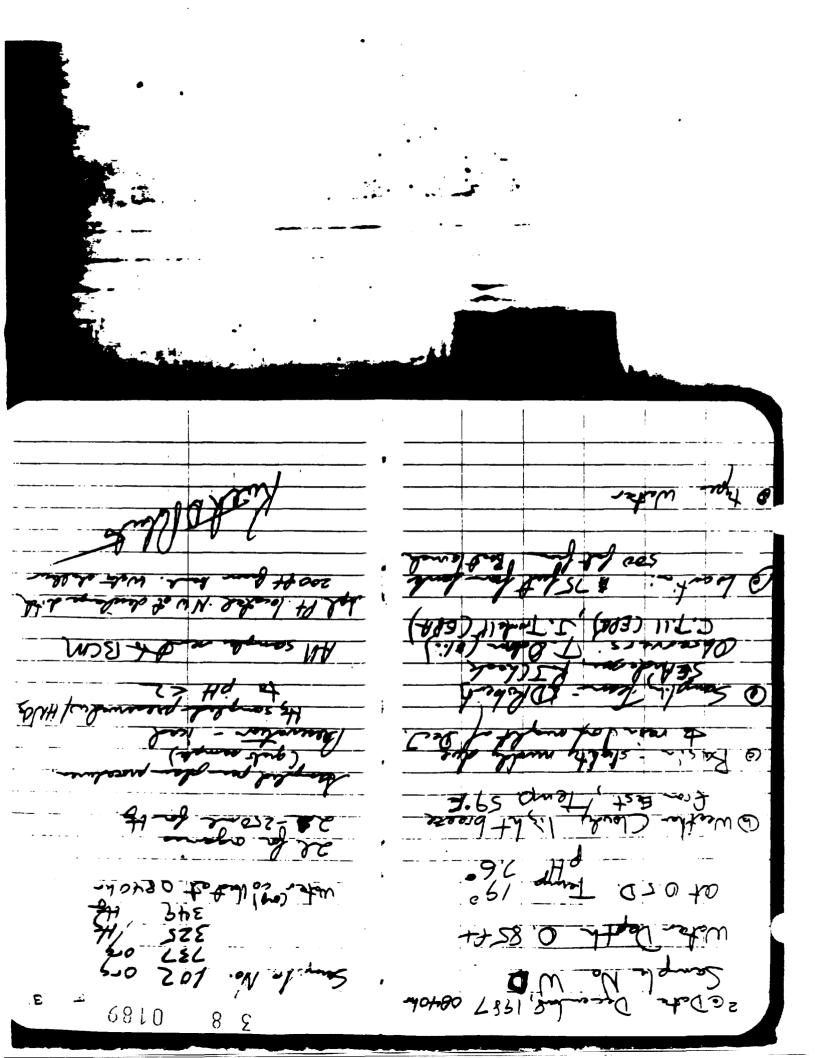
proof Thread.

This Book is manufactured of a High Grade

50% Rag Ledger Paper having a Water Resistant Surface, and is sewed with Nylon Water-

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The resonant Many Copter

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100 to out but lother

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12xx OBS. TIM (EPA) Odon dilch+ western Roberts, Adem 9 Dec 57 No har Clock 782 'X BCM 0205 25

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EPA observers were John Trudell, III (drank) Charles Till (EPAESD)

# APPENDIX 3 FIELD OVERVIEW CHECKLIST

## McINTOSH BASIN FIELD OVERVIEW CHECKLIST

SITE NAME	McIntosh Basin
LOCATION	Olin Plant, McIntosh AL
STUDY DATE(S)	December 7-9, 1987
FACILITY CONTACT	Toni Odom
PHONE NUMBER	8-421-1350
CONTRACTOR	BCM Converse, Inc. (John Tobin)
ADDRESS	1850 Gravers Road, Norristown, PA 19401
PHONE NUMBER	215/275-1190
PROJECT LEADER	Arnold L. Feldman 8-448-4510
OTHER CONTRACTOR/S	TATE PERSONNEL
EPA ESD OVERVIEW PE	RSONNEL John A. Trudell III, Charles Till
OTHER PERSONNEL AN AFFILIATION	<b>D</b> :
	l .

### PLANNING AND PREPARATION

1)	Was a study plan, work plan, site operations plan, etc. issued for this investigation?	Y	
	Date Issued: August 13, 1987/Revised October 11, 1987		
	If YES:		
	Was the study plan reviewed by ESD?	Y	
	Was the study plan acceptable? 10Nov87	Y	
SAM	IPLING		
Gen	eral Procedures		
1)	Were sampling locations properly selected? As specified by Plan.	Y	
	If No, explain		
2)	Were samples collected starting with the least likely contaminated and proceeding to the most likely contaminated?	Y	
	Remarks Collected in order which would minimize disturbance at water column by boat: contaminant levels are expected to be the same in all samples.		
3)	Were new disposable rubber gloves worn during collection of all samples?	Y	1
	Remarks		
4)	Was sampling equipment wrapped in aluminum foil and protected from possible contamination prior to sample collection?		i'
	If No explain. All cample equipment cleaned immediately prior to use		

		Y or N
5)	If equipment was cleaned in the field, were proper procedures used? (This includes storage method for rinse water and solvents)	Y
	Followed EPA procedures.	
6)	What field instruments were used during this investigation: <u>pH/temperature meter. 100 foot tape measure. weight bottle sampler.</u>	
7)	Were field instruments properly calibrated?	Y
	Calibrated in laboratory: calibration checked daily in field prior to use.	
8)	Were calibration procedures documented in the field notes:	Y
	Remarks	
9)	Were the samples chemically field preserved:	Y
	He samples preserved with 5 ml of 70% HNO <sub>3</sub> : all samples placed on ice immediately after collection.	
10)	Were the samples iced?	Y
11)	Were samples for selected parameters field filtered:	N
	If Yes, list parameters and describe procedures.	
Surf	ace Water Sampling	
1)	What procedures and equipment were used to collect surface water samples?	
£	At water depths <2 feet, grab samples were taken at 0.5D. At water depths weight bottle sampler was used.	>2 feet.

		Y or N
	Who collected samples? S. E. Anderson and R. J. Cheek	
2)	Did the samplers wade in the stream during sample collection	Y
	If Yes:	
	Did the sampler face upstream while collecting sample?	Y
	Did the sampler insure that roiled sediments were not collected along with water sample?	Y
3)	Note any deficiencies observed during the collection of the surface water samples None	
Wasi	te, Sludge, Soil/Sediment Sampling	
1)	What procedures including equipment were used to collect soil/sediment samples? Stainless steel scoops (spoons) were used where water depths were less than 1 foot. Where water depths were greater than 1 foot. ponar dredged was used.	
2)	Were the soil/sediment samples well mixed prior to placing the sample in the sample container?	Y
3)	Note any deficiencies observed during the collection of the soil/sediment samples None	
	Total number of samples collected 10 sediment samples in duplicate	
Othe	er Sampling	
1)	What other types of samples were collected during this investigation?	

		Y or N
2)	What procedures were used for the collection of these samples?	
	Who collected samples?	
QU.	ALITY ASSURANCE/QUALITY CONTROL	
	(While all of these QA/QC procedures are not necessarily used, please identify the specific techniques which were employed by sampling personnel.)	
1)	Did the sampling personnel utilize any field trip blanks?	Y
2)	Did the sampling personnel utilize preservative blanks?	Y
	If Yes, to either of the above questions, list the types and handling of the blanks Field and trip blanks were used for water (organics), water (Hg) and sediment samples. Water (Hg) samples preserved with HNO <sub>3</sub> .	
3)	Were any equipment blanks collected?	Y
	If Yes, list: Water samples for organics and Hg collected from dredge rinse water.	
4)	Were any duplicate samples collected?	Y
	If Yes, list the types (parameter coverage, etc.) and describe their handling. All samples collected in duplicate. This includes water for Hg and organics and sediment for Hg and organics. All samples iced and shipped to BCM. EPA also receive one water sample for Hg, one water sample for organics and one sediment sample for Hg and organics.	

		Y or N
	Were any spiked samples utilized?	N_
	If Yes, list the types (parameter coverage, etc.) and describe their handling.	
RT.	D DOCUMENTATION AND CHAIN-OF-CUSTODY	
	Were split samples offered to the EPA.	Y_
	Were chain-of-custody records completed for all samples?	Y_
	Were sample tag numbers cross referenced to chain-of-custody forms?	Y_
	Were chain-of-custody form numbers recorded in the field log book?	N_
	Were all samples properly sealed at the time of collection?	Y_
	Were samples locked in vehicle or kept in a secure place after collection?	Y_
	Were all sample tags and chain-of-custody forms signed by sample collector(s)?	Y_
	Were sampling locations adequately documented?	Y_
	If No, explain	
	Was sampling documented with photographs? by EPA	Y_
)	Were the samples shipped to a contract laboratory?	Y_
	Were the samples properly packed for shipment?	Y

3 8 0221

Individually wrapped in bubble pack.

# APPENDIX III SAMPLING PROCEDURES

#### McINTOSH BASIN

#### WATER SAMPLING PROCEDURE

- 1. Measure water depth
- 2. Measure pH at 0.5 depth
- 3. Measure temperature of water at 1 foot intervals (depth)
- 4. Collect water sample using weighted bottle sampler
  - a. If water contains two layers with different temperatures, collect 2 liters from mid point of each layer.
  - b. If water contains no layers with different temperatures, sample as follows:
    - 1) Water less than 5 feet deep, sample 4 liters at 0.5D. If water is less than 1 foot deep, weighted bottle sampler will not be used.
    - 2) Water greater than 5 feet but less than 10 feet deep, sample 2 liters at 0.33D and 2 liters at 0.67D for organic analysis.
    - 3) Water greater than 10 feet, sample 1 liter at 0.20D, 1 liter at 0.4D, 1 liter at 0.6D and 1 liter at 0.8D for organic analysis.
  - c. Composite water samples in 4 liter glass bottles. Shake sample well. Split sample into three 1 liter samples (2 for BCM and 1 for EPA) for organics and three 250 ml samples.
- 5. Mercury samples will be acidified to a pH of less than 2.0 with 70% ACS reagent grade nitric acid.
- 6. Mark water sampling location with an anchored styrofoam block.
- 7. Water samples for organics will be collected in glass bottles. Water samples for mercury will be collected in polyethylene bottles.
- 8. Clean bottles will be used at each sampling point and sampling depth. Weighted bottle sampler will be cleaned at each sampling location prior to use.
- 9. The following data are recorded in the field log book:
  - a. Date
  - b. Observable weather conditions (sunny, cloudy, etc.)
  - c. Observable basin condition (clear, muddy, etc.)
  - d. Sampling team members names

## McINTOSH BASIN WATER SAMPLING PROCEDURE Page 2

- e. Sample location
- f. Sample type (water, sediment)
- g. Water depth, temperature, pH
- h. Description of sampling point
- i. Time sample collected
- j. Sample number
- k. Number and volume of samples taken
- 1. Sampling methodology
- m. Field preservation, if any
- n. Sample distribution and how transported
- o. Signatures of sampling team members
- 10. The following data are recorded on each sample bottle:
  - a. Sample number
  - b. Sample identification
  - c. Sample type
  - d. Name of collector
  - e. Date and time of collection
  - f. Place of collection
  - g. Sample preservation information
  - h. Analysis required
  - i. "Olin Corporation, McIntosh, Alabama"
- 11. Each sample bottle will be sealed with a signed custody seal that contains the following information: sample number, date, time, location and name of collector.

#### McINTOSH BASIN WATER SAMPLING PROCEDURE Page 3

- 12. Each sample will be placed on ice after collection.
- 13. A chain-of-custody record will be prepared and accompany each sample during shipment to laboratory.

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#### McINTOSH BASIN

#### SEDIMENT SAMPLING PROCEDURES

- 1. Measure water depth
- 2. Measure temperature of water at 0.5D
- 3. Measure pH of water at 0.5D
- 4. Using ponar dredge collect sample of sediment. If water depth is less than 1 foot, sediment samples will be collected with stainless steel spoons.
- 5. Place sample in aluminum foil-lined pan. Remove sticks and other vegetative matter. If sample contains excessive water, allow sample to stand for a few minutes and carefully decant water. Homogenize sediment thoroughly. Split out three 100 to 200 gram samples (two samples for BCM and one for EPA).
- 6. The following re recorded in the field log book:
  - a. Date
  - b. Observable weather conditions (sunny, cloudy, etc.)
  - c. Observable basin condition (clear, muddy, etc.)
  - d. Sampling team members names
  - e. Sample location
  - f. Sample type (water, sediment)
  - g. Water depth, temperature, pH
  - h. Description of sampling point
  - i. Time sample collected
  - j. Sample number
  - k. Number and volume of samples taken
  - 1. Sampling methodology
  - m. Field preservation, if any
  - n. Sample distribution and how transported
  - o. Signatures of sampling team members

## McINTOSH BASIN SEDIMENT SAMPLING PROCEDURES Page 2

- 7. The following data are recorded on each sample bottle:
  - a. Sample number
  - b. Sample identification
  - c. Sample type
  - d. Name of collector
  - e. Date and time of collection
  - f. Place of collection
  - g. Sample preservation information
  - h. Analysis required
  - i. "Olin Corporation, McIntosh, Alabama"
- 8. Each sample bottle will be sealed with a signed custody seal that contains the following information: sample number, date, time, location and name of collector.
- 9. Each sample bottle will be placed on ice after collection.
- 10. A chain-of-custody record will be prepared and accompany each sample during shipment to laboratory.
- 11. Ponar dredge, mixing pan and mixing spatula will be cleaned using designated procedures after collection of the sample from each location.

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#### McINTOSH FIELD PROCEDURES

#### DREDGE CLEANING PROCEDURE

- 1. Rinse/brush off sediment with basin water
- 2. Wash with tap water and alconox
- 3. Rinse with tap water
- 4. Rinse with deionized water
- 5. Rinse twice with pesticide-grade isopropanol
- 6. Rinse thoroughly with organio-free water Not available
- 7. Allow to air dry
- 8. Wrap with aluminum foil
- may be omitted if organic-free water is not available
   Reference ESD SOP and QA manual, April 1, 1986, Secton B.8.3

#### SUPPLIES NEEDED

Alconox - 1 lb

Pesticide grade Isopropanol - 2 gallons

Wash bottle (1000 ml) - 2 each

Wash tubs - 2 each

Nylon brushes - 2 each

KDR/jmm 12/11/**87** 194 APPENDIX 4
CHAIN-OF-CUSTODY

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MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

			i .		•		/ses Requested/
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11	11	257	1350	12	ı	14	
h	4 /	105	tere.		-+	17	Sent to EPA
Collector's Na	me (Signa	turey	led	<u> </u>	Date of C	ollection	slees)
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•							
CHAIN OF POSSE	SSION:	lest:	S-Assa (Title)	c En P	H Suc	Dec S.	1987   1800 ve dates/times)
Remarks:_							
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Remarks:_	14	·					
(Signatur			(Title)			(Inclusion	ve dates/times)
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Remarks:							

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553 (205) 944-2231

				Analyses Requested/ .
Sample Location	Time	рН	# Container	s Remarks
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11 4 # 492	1430	4	- 1	"
" # # 838	1500	\$	1	(,
" 4 # 283	1515	1	1	lı
4 u # 349	0850	¥		`4
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Collector's Name Leth Doll	exte		Date of Co	ollection Dec 87
(Signature)				
SAMPLE RECEIVERS:				
1. BCM Laboratory D (Name and address of organization)	ion reco	50 Grau	vers Road	Norristann PA 19401
2.				
3.				
CHAIN OF POSSESSION:	Acre	100		00 07 /10
Kuth Ukobert	Sr Enu	HHar	s oppe	BDec 87 /1800 (Inclusive dates/times)
	(Title)			(Inclusive dates/times)
Remarks:				
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Remarks:	<del></del>	<del></del>		
2. (Signature)	(Title)			(Inclusive dates/times)
Remarks:				•
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(Signature)	(litle)			(Inclusive dates/times)
Remarks:				

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-231

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	t		•	Analy	ses Requested/ .
Sample Location	Time	рН	# Container	s	Remarks
McIntos Bart # 908	1515	22	1	Ha	
11 # 221	1430	42		Ha	
" " ± 523	1130	حر		kta	
" # 325	5850	<b>L</b> 2		H'S	
1 #312	1205	42	1	He	
" # 442	H30	22	1	Hs	
Collector's Name (Signature)	bent		Date of C		Blec 87
SAMPLE RECEIVERS:					
1. BCM Laboratory D. (Name and address of organization)	V 189	O Gran	restord 1	bristow	
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3					
CHAIN OF POSSESSION:  (Signature of collector)	Solese	Env	HE Spec	BDe-	87 //800 e datgs/times)
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Remarks:					

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

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0233

	i			. Analyses F	Requested/
Sample Location	Time	рН	# Containers		arks
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/	/			-	
				/ /	/
1				/	<del>-</del>
Collector's Name Kuth.	OKA	nt	Date of Co	11ection 80	287
(Signature)					
SAMPLE RECEIVERS:					
	N 10-0		0 111.	+ OA	101121
(Name and address of organ	nization rec	Graves /	ample)	\$10WA 111 1	7401
2.				•	
3.					
		•			
CHAIN OF POSSESSION:	•				
(Signature of collector)	Sr kao 6	whates	ner '	8Dec87	1800
(Signature of collector)	(Title)			Inclusive da	tes/times)
Remarks:	<del></del>		<del></del>		
· form T. Rusa	- Samp	اور حا	odio n	19/87/O Inclusive da	100
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MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2331

0234

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Sample Location	Time	рН	# Containers	Analyse:	s Reques emarks	ted/
Mc Twosh Besh # 942	1515		1	Organic		DCB
u u # 102				٧,,	и	34
u " # 509	1205			ы	ŧI	4,
u 4 - 451	1205			ч	и	31
# 869			1	`и	41	
# 878	1515			þ	ν	4
ollector's Name Kuthoklu	4		Date of Co	llection S	2 Der 8.	7
(Name and address of organizate)  HAIN OF POSSESSION:  (Signature of collector)			H.Spe.			nes)
Remarks:  Signature)  Remarks: No Field Blanks	(Title)	e cush 87 Xdy Se,	τ	Sample Inclusive	<u> </u>	mes)
•	(Title)			Inclusive	dates/ti	mes)
(Signature)	(Title)			Inclusive		

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

3 8 0235

_		t		•		/ses Req	uested/
Sam	ple Location	Time	рН	# Containers		Remar	ks
ma	Intosh Busin # 420	/320		1	Organic	s (RUB	D<8)
	" Trip Blank			2 KOR	h	14	ч
	11 11 424	1350			и	n	n
	" Trio Bland	<u> </u>		1	4	И	и
	1 11 4777	1500		1	h.,	٠.	1)
	" " 341	1/30					и
Coll	lector's Name (Signature)	Hect		Date of Co	llection	. 8De	87
	PLE RECEIVERS:  BCM Laboratory Dr. 1  (Name and address of organization)	850 Graation reco	zvesR eiving	sample)	town t	PA 19	7401
3.						<del> </del>	<del> </del>
J.							
CHA1	IN OF POSSESSION (Signature of collector)	(litle)	En Al	P.Spee (	S)er S Inclusiv	S)/ve date	/ //s/ s/times)
	Remarks:		· · · · . ·				
ر ۱۰	Ahr T. Ruse	Samp	1e <u> </u>	stadion (	19/87	1090	00
		(litle)		7	Inclusiv	ve date	s/times)
	Remarks:						
2.	(Signature)	(Title)	<del></del>	τ	Inclusiv	ve date	s/times)
	Remarks:						
3.							
-•	(Signature)	(Title)		7	Inclusion	ve date	s/times)
	O a manufactura						

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553 (205) 944-2231

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		CHA	IN OF C	USTODY F	RECORD	3 8	023	6
			ı	•	•	_	ses Requ	
Sample Location			Time	рН	# Container		Remarks	
McIntosh	Besin	<i>#737</i>	0840		1	Organis	(RUB	DES
4	и	4672	1320		l	4	4	~
ч	4	# 150	1425		1	lc	и	4
11	••	4696	1425			a	4	*
11	u	4560	1130		l	a"	(ACUB	,OCB)
11	4	4654	1500		(	•4	н	n
Collector's Name	1)-	POK	7	/	Date of C	allection	OA.	27
COLLECTOL 2 Mane	(Signa	ture)		<u> </u>		DITECTION	0	-0 /
1. RCM (Name and add) 2. 3. CHAIN OF BOSSESS!	ion:			· · · · · · · · · · · · · · · · · · ·	ample)			
(Signature o	OT COIL	ectory	(litie)		,	(Incinzia	e dates/	(times)
1. (Signature) Remarks:	Riae		(Title)	ole Cu.	s-lodium	(Inclusiv	e dates,	900 (times)
2. (Signature)  Remarks:			(Title)			(Inclusiv	e dates,	/times)
3. (Signature) Remarks:			(Title)			(Inclusiv	e dates,	/times)

## 4.f4

### Olin CHEMICALS

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

3 8 0237 CHAIN OF CUSTODY RECORD Analyses Requested/ Time # Containers Sample Location Remarks #362 1005 h Date of Collection 8 Dec 87 Collector's Name SAMPLE RECEIVERS: BCM Laborton Div 1850 Greves Road Norristaur PA 1940/
(Name and address of) organization receiving sample) CHAIN OF POSSESSAION: (Title) Spe 80 / 1900 (Inclusive pates/times) Remarks: Sample Custedion 19/2/0900 (Inclusive dates/times) Remarks:\_\_\_ 2. (Signature) (litle) (Inclusive dates/times) Remarks: 3. (Signature) (Inclusive dates/times) (Title)

Remarks:

19/3

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

CHAIN OF CUSTODY RECORD

3 8

0238

	ole Location	1		•	Analyses Requ	e2rea\
tn.		Time	рН	# Container:		-
	Intosh Basin # 941	1425	_		they + Organic	<u>u</u>
	¥ 532	1335			7 4	
	2384	1345			11 M	
	# 807	1345			4 4	
	± 217	1030		1	4 4	
	#308	1425	-		4 10	
Coll	ector's Name (Signature)	best	0	Date of Co	ollection 9Dec	-87
1. [ 2. 3.	RECEIVERS:  (Name and address of organization)	8 Grave.	elving	sample)	~ PA 19401	
CHAI:	N OF POSSESSION:  (Signature of collector)	SrAssa (Title)	En A	e San	9D- 57 /	••
		(,		1	9Dec <7 //	(900 (times)
1. 	Remarks:  foh To Rose (Signature)	Samp		todion	Inclusive dates/	30
1. <i>C</i>	John T. Rome	Samp (Title)	او ( ن	to dien	2/10/07/09	30 (times)

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

CHAIN	0F	CUS'	TODY	RECORD

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0239

Remarks  Hy + Organics
tg + Organics
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Й "
n n
h ir
u 1,
b. 11
ection 9 Dec 87
stown PA 1940/
Dec 87 (1900) iclusive dates/times)
lide7   0930 iclusive dates/times)
nclusive dates/times)
•
nclusive dates/times)

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553 (205) 944-2231

CHAIN OF CUSTODY RECORD

3 8 0240

	1	•	1	Analyses Requested/ ,
Sample Location	Time	рН	# Containers	Remarks
McIntosh Basin 919	1015		1	Hy + Organics
u 4 4408	1515		/	4 4
n / n Trip	B	ank	/	
	1			
1	01			
Collector's Name	fici	t	Date of Co	11ection 9Dec 87
(Signature)			<del></del>	
SAMPLE RECEIVERS:				
1. BCM Laboration 185 (Name and address of organizar	O Grad	vers k	amp re)	istown PA 19401
2				
3				
CHAIN OF POSSESSION:  (Signature of collector)	S.A. (Title)	e bus	Me Spie {	Dac 9 87 /1900 Inclusive dates/times)
Remarks:				
1. Signature)	Sam P (Title)	le Cu	3- <del>10</del> 9/20	19/87/0930 Inclusive dates/times)
Remarksz		<del>_</del>	<del></del>	
2. (Signature)			•	Inclusive dates/times)
Remarks:				
(Signature)	(Ittle)		<del></del> (	Inclusive dates/times)
Remarks:				

1/2

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

3 8

0241

	i i			Analyses Requested/
Sample Location	Time	рН	# Containers	Remarks
McIntash Bash +	-183 1335			Hy + Organics
Tr.6 B1	ank -		1	11 11
Mc Trock Bash	615 1015	-	1	11 11
n u	782 1315	<b>+</b> -	1	11 9
·u u	28/1450	-	1	Organics
u	966 1315		1	4
Collector's Name Kill	D Robert		Date of Co	11ection 92687
SAMPLE RECEIVERS:  (Name and address of	1850 GV	care/	s Rd 1	Bruish PA19
·			,, ,,	•
•				
· ·	<del></del>			<del></del>
HAIN OF POSSESSION: (Signature of collection)	I Suffering		At f	9 Dec 97 (70) Inclusive dates/times)
(Signature of collection)  Remarks:  (Signature)	(little)		stodien (	
(Signature of collection)  Remarks:  (Signature)  Remarks:	(little)		stodien (	Inclusive dates/times)
(Signature)  Remarks:  (Signature)	(Title)		= <del>/</del>	Inclusive dates/times)    Alile   09.50   Inclusive dates/times)
Remarks:  (Signature)  Remarks:  (Signature)  Remarks:	(Title)		<del>-/- dien</del>	Inclusive dates/times)  Inclusive dates/times)  Inclusive dates/times)
(Signature)  Remarks:  (Signature)  Remarks:	(Title)		<del>-/- dien</del>	11/27/09-50

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

CHAIN OF CUSTODY RECORD

3 8 0242

Analyses Requested/

	•		72	_11		ľ	0 1	
ample Locat	ion	4.	Time	рН	# Containers		Remarks	
MeIntock	Besin	#401	0920	_	(	H2 4	Organies	
<b>4</b> . (1	4	1507	0950	_	1	н	64	
1/	4	# 267	1015	_	1	и	11	
41	11	# 907		-	1	1	4	
. 11	n	# 483	1030			4	4	
И	и	+ 790	1315		1	4	u	
ollector's h	lame V	HAD L	I at		Date of Co	Mecti	on 92-87	2
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	(Sign	ature)		·			OII <u>7 =                                  </u>	
					A Norri			
	ESSION:	· · ·		·				
	ESSION:	DI +	C Dec.	Gare A				<u></u>
IAIN OF POSS	De	Iscior)	(fills)	Gur A			87/17	<i>්</i> ල උ res )
IAIN OF POSS	re of co	Dector).	(field)	Gur A		Vec	87/17	ලිට Yes )
(Signatu	re of co			Gw A	g 9	Vec	87/17	ලිට (es)
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MCINTOSH PLANT - MCINTOSH, ALABAMA 36553

(205) 944-2231

### CHAIN OF CUSTODY RECORD

3 8 0243

	1		•	, Analyses Requested/ .
Sample Location	Time	рН	# Containers	Remarks
McAntosh Bushn # 118	2300		/	Organies
u u # [43	2300		1	Organico
11 1/ # 136	2300		1	Ha
11 11 301	2300		1	Ha
11 11 # 760	2310		1	Digaria
n n # 810	2310		1	Hg
Collector's Name Kulk (Signature)	erts		Date of Co	11ection 9Dec 87
SAMPLE RECEIVERS:  1. Rem Laboratory /850 (Name and address of brganizate)  2.  3.	Gavers	Realizing s	Norrista Sample)	~ PA 19401
CHAIN OF POSSESSION:			1-0-	<i>~</i>
	STESA	- Env		avec 87 0800
	finess.			inclusive dates/times)
	Samp (Title)	le Cus	kdion (	Alile7/0920 Inclusive dates/times)
Remarks:	···		<del></del>	
(Signature)	(Title)	<del></del>		Inclusive dates/times)
Remarks:		· ·		
(Signature)				Inclusive dates/times)
Remarks:				

MCINTOSH PLANT - MCINTOSH, ALABAMA 36553 (205) 944-2231

	CHAIN OF C	USTODY I	RECORD	38 0244
	1	•		Analyses Requested/
Sample Location	Time	рН	# Containers	Remarks
McAntosh Barin # 70	12-2320	_		Organics
11 1 1 94	2320	1	1	Ha
. /				,
		-		
Collector's Name Realth	Oll	d	Date of Co	ilection Dec 87
(Signature)	JA VE	<u>~</u>	Date of co	Trection /vees /
SAMPLE RECEIVERS:	100	0	00	11 1 (D)
1. Mame and address of organi	7350 (	Jave	15 Kood, 1	Corristiun 1/1/96
2.		siving .	iding ite y	•
		<del> </del>		
3.				
CHAIN OF, POSSESSION:		•		••
1/ A PV 1	CA	2.	M.Son A	PM UT DOM
KULKARIER		CENU,	the production of	Inclusive dates/times)
Remarks:			·	•
A A TO P				1/2/0020
1. Aug T. Kone (Signature)	- <u>Dum</u> (Title)	واد رن	s-paten	alije 7/0 920 Inclusive dates/times)
Remarks:	•		•	· · · · · · · · · · · · · · · · · · ·
<del></del>	····			
2. (Signature)	(Title)	· · · · · ·		Inclusive dates/times)
Remarks:				
3.				
(Signature)	(Title)	-		Inclusive dates/times)
Remarks:				

## APPENDIX 5 ANALYTICAL ANALYSIS